

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

DAVID MAZZA,

Plaintiff,

V.

VERIZON SICKNESS AND ACCIDENT
DISABILITY BENEFIT PLAN FOR
NEW ENGLAND ASSOCIATES, *et al.*,

Defendants.

Civil Act. No. 04-30020-MAP

MOTION FOR ENTRY OF APPEARANCE *PRO HAC VICE*

Defendants Verizon Sickness and Accident Disability Benefit Plan for New England Associates and Verizon Communications Inc. (“Verizon”) hereby move that Karen M. Wahle of the law firm of O’Melveny & Myers LLP, 1625 Eye Street, N.W., Washington, DC, be admitted *pro hac vice* in the above case as defendants’ trial counsel with local counsel identified below, on the following grounds:

1. The law firm of O'Melveny & Myers LLP is national counsel to Verizon Communications Inc.
2. Ms. Wahle has a long-standing attorney client relationship with Verizon.
3. Ms. Wahle's past experience in working with Verizon will enable it to handle this matter efficiently because of her knowledge of Verizon's operations and her past experience with Verizon's in-house counsel.

WHEREFORE, defendants respectfully request that this Court admit Karen M. Wahle *pro hac vice* in the above case as trial counsel. In support of this Motion, defendants respectfully refer this

Court to the Affidavit of Karen M. Wahle filed herewith.

Dated: November 10, 2004

Respectfully submitted,

____s/Amy D. Siefer____

Amy D. Siefer, BBO 550639

Lisa M. Birkdale, BBO 549663

Verizon Communications Inc.

Legal Department

185 Franklin Street

Boston, MA 02110-1585

(607) 743-5764

Attorneys for Defendants

Verizon Sickness and Accident Disability Benefit

Plan for New England Associates

Verizon Communications Inc.